

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:

RED RIVER TALC LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 24-90505 (CML)

**CERTIFICATE OF NO OBJECTION WITH  
RESPECT TO DEBTOR'S MOTION TO SEAL**

[Related to Docket No. 869]

Pursuant to the *Procedures for Complex Cases in the Southern District of Texas*, effective September 18, 2024 (the “Complex Case Procedures”), and the *Order Granting Complex Chapter 11 Bankruptcy Case Treatment* [Dkt. 38] entered in the above-captioned chapter 11 case, the undersigned hereby certifies as follows:

1. On December 30, 2024, Red River Talc LLC, the debtor in the above-captioned chapter 11 case (the “Debtor”) filed the *Motion of Debtor for Entry of an Order Authorizing the Filing Under Seal of Debtor's Emergency Motion to Compel the Deposition of Leigh O'Dell* [Dkt. 869] (the “Motion”).

2. The deadline for receipt of objections to the Motion has passed.

3. In accordance with paragraph 44 of the Complex Case Procedures, the undersigned represents to the Court that the Debtor is unaware of any objection to the Motion and that counsel has reviewed the Court's docket and no response appears thereon.

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 8508. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

4. Attached hereto is the proposed *Order Granting Motion of Debtor for Entry of an Order Authorizing the Filing Under Seal of Debtor's Emergency Motion to Compel the Deposition Of Leigh O'Dell* (the "Proposed Order").

5. The Debtor respectfully requests that the Court enter the Proposed Order.

Dated: January 22, 2025  
Houston, Texas

Respectfully submitted,

/s/ John F. Higgins

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PROPOSED ATTORNEYS FOR DEBTOR

**Certificate of Service**

I certify that on January 22, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtor's claims, noticing and solicitation agent.

/s/ John F. Higgins  
John F. Higgins